

Robert C. Ryan (#7164)  
Tamara Reid (#9840)  
HOLLAND & HART LLP  
5441 Kietzke Lane, Second Floor  
Reno, Nevada 89511  
Phone: (775) 327-3042  
Fax: (775) 786-6179  
[reryan@hollandhart.com](mailto:reryan@hollandhart.com)  
[treid@hollandhart.com](mailto:treid@hollandhart.com)

Christopher B. Hadley (admitted *pro hac vice*)  
DART, ADAMSON & DONOVAN  
1225 Deer Valley Drive, Suite 201  
Park City, Utah 84060  
Phone: (435) 615-2264  
Fax: (435) 608-1697  
[cbhadley@hollandhart.com](mailto:cbhadley@hollandhart.com)

*Attorneys for Plaintiff and Counter Defendants*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHEMEON SURFACE TECHNOLOGY, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

METALAST INTERNATIONAL, INC., a Nevada  
corporation; METALAST, INC., a Nevada  
corporation; SIERRA DORADO, INC., a Nevada  
corporation; DAVID M. SEMAS, an individual;  
GREG D. SEMAS, an individual; and WENDI  
SEMAS-FAURIA, an individual.

Defendants.

DAVID M. SEMAS; and METALAST  
INTERNATIONAL, INC.,

Counterclaimants,

v.

CHEMEON SURFACE TECHNOLOGY, LLC,  
DEAN S. MEILING; and MADYLON  
MEILING,

Counter Defendants.

Case No.: 3:15-cv-00294-MMD-VPC

**STIPULATION and [PROPOSED]  
ORDER TO EXTEND BRIEFING  
SCHEDULE  
[FIRST REQUEST]**

CHEMEON SURFACE TECHNOLOGY, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

MHA GROUP, a company; and MARC HARRIS,  
an individual.

Defendants.

Consolidated with:

Case No. 3:15-cv-00295-MMD-VPC

Plaintiff/Counter defendants CHEMEON Surface Technology and Counter Defendants Dean S. Meiling and Madylon Meiling (collectively “CHEMEON”), by and through their undersigned counsel, Robert C. Ryan of Holland & Hart, LLP; Defendants Metalast International, Inc., Metalast, Inc., Sierra Dorado, Inc., David M. Semas, and Counterclaimants Metalast International, Inc. and David M. Semas (collectively “Metalast Defendants”), by and through their undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree as follows:

1. The Court entered its Order (ECF No. 398) concerning three motions for summary judgment (ECF Nos. 313, 314, 331) on March 30, 2018.

2. The Order directed CHEMEON and the Metalast Defendants to provide supplemental briefing within seven (7) days of the Order.

3. Pursuant to the Order, the supplemental briefing is due April 6, 2018.

4. The parties agree to a short extension to April 10, 2018, within which to file the supplemental briefs.

5. This extension is agreed to and requested from the Court because counsel for Plaintiff has had matters requiring immediate action this week which has impacted the ability to finalize the briefing required by this Court. Counsel for the Metalast Defendants has no objection to the short extension.

///

///

///

6. This is the first request for an extension of time to file the supplemental briefs.

7. This request for an extension is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 5th day of April, 2018.

DATED this 5th day of April, 2018.

HOLLAND & HART LLP

HOY CHRISSINGER KIMMEL PC

/s/ Robert C. Ryan  
Robert C. Ryan (7164)  
Tamara Reid (9840)  
5441 Kietzke Lane, Second Floor  
Reno, Nevada 89511  
*Attorneys for Chemeon Surface Technology,  
LLC, Dean S. Meiling, and Madylon Meiling*

/s/ Michael D. Hoy  
Michael D. Hoy (2723)  
Bank of America Tower  
50 West Liberty Street, Suite 840  
Reno, Nevada 89501  
Telephone: (775) 786-8000  
Facsimile: (775) 786-7426  
*Attorneys for Metalast International, Inc.,  
Metalast, Inc., Sierra Dorado, Inc., David M.  
Semas, Greg D. Semas, and Wendi Semas-  
Fauria*

**IT IS SO ORDERED.**

UNITED STATES DISTRICT JUDGE

DATED: April 5, 2018

**HOLLAND & HART LLP**  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Phone: (775) 327-3000 ♦ Fax: (775) 788-1111

**PROOF OF SERVICE**

Pursuant to FRCP 5, I, Gay Groves, declare, as follows:

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

I am readily familiar with Holland & Hart's practice for collection and processing of: HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of business provides for the delivery or faxing and/or mailing with the United States Postal Service, to occur on the same day the document is collected and processed.

On April 5, 2018, I served the foregoing, **STIPULATION and [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE [FIRST REQUEST]**, as follows:

☒ **ELECTRONIC:** by electronic transmission through the United States District Court's CM/ECF system to the parties below:

Michael D. Hoy  
HOY CHRISSINGER KIMMEL  
Bank of America Tower  
50 West Liberty Street, Suite 840  
Reno, Nevada 89501  
Telephone: (775) 786-8000  
Facsimile: (775) 786-7426  
[mhoy@nevadalaw.com](mailto:mhoy@nevadalaw.com)

*Attorneys for Defendants*

☒ **U.S. MAIL:** by placing a true copy thereof in Holland & Hart's outgoing mail in a sealed envelope addressed as follows:

Marc Harris  
2471 Morning Dew Drive  
Brea, CA 92821  
Telephone: 714-642-1021  
Email: [Marcharr3@hotmail.com](mailto:Marcharr3@hotmail.com)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on April 5, 2018.

/s/ Gay Groves